

**IN THE UNITED STATE DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

RACHEL RAMSBOTTOM)	
ALEXIS BOWLING)	
JENNA HOUSTON)	
JANE DOE #1)	CIVIL ACTION
)	
Plaintiffs)	No. 3:21-cv-00272
)	
v.)	JURY TRIAL DEMANDED
)	
LORIN ASHTON,)	JUDGE ALETA A. TRAUGER
AMORPHOUS MUSIC, INC.,)	
BASSNECTAR TOURING, INC.,)	
C3 PRESENTS, L.L.C.,)	
INTERACTIVE GIVING FUND,)	
GNARLOS INDUSTRIES, LLC,)	
CARLOS DONOHUE; ABC)	
CORPORATIONS, ONE THROUGH)	
TEN (said Names Being Fictitious),)	
JOHN DOES, ONE THROUGH TEN)	
(said Names Being Fictitious))	
)	
Defendants.)	

**JOINT MOTION AND STIPULATION TO EXTEND
THE DEADLINE FOR DEFENDANTS GNARLOS INDUSTRIES, LLC
AND CARLOS DONOHUE TO FILE ANY MOTION TO DISMISS**

Comes now Plaintiffs and Defendants Gnarlos Industries, LLC (“GI”) and Carlos Donohue (“Donohue”), by and through undersigned counsel, and respectfully move this Court for an Order extending the deadline for Defendants GI and Donohue to file any Motion to Dismiss. In support of this Motion, undersigned counsel states:

All counsel to this action that had been served, during a meet and confer conference call held on May 17, 2021, agreed that, to the extent any defendant should file a Motion to Dismiss, that Plaintiffs would be permitted thirty (30) days to respond; and that any defendant would be permitted

fourteen (14) days to file a reply to any opposition from the service of said opposition. Counsel for Defendants Gnarlos Industries (“GI”) and Carlos Donohue (“Donohue”) and counsel for Plaintiffs separately agreed to apply the above briefing schedule upon acceptance of service of the First Amended Complaint by Defendants GI and Donohue which occurred on June 24, 2021. The deadline for Defendants GI and Donohue to file any Motion to Dismiss is August 23, 2021. Subject to this Court’s permission, Counsel for Defendants GI and Donohue and counsel for Plaintiffs now agree that Defendants GI and Donohue shall have until August 30, 2021, to file any Motion to Dismiss. Pursuant to the agreement of all counsel, Plaintiffs shall file their opposition no later than thirty (30) days from service of Defendants GI and Donohue’s Motion to Dismiss, or September 29, 2021; Defendants GI and Donohue, may file a reply no later than fourteen (14) days from service of Plaintiffs’ opposition.

IT IS HEREBY STIPULATED AND AGREED TO, SUBJECT TO THIS COURT’S PERMISSION, by and between counsel for the undersigned parties, that:

1. Defendants GI and Donohue, shall file any Motion to Dismiss on or before August 30, 2021, subject to this Court’s permission.
2. Plaintiffs’ response to Defendants GI and Donohue’s Motion to Dismiss shall be filed no later than September 29, 2021.
3. Defendants GI and Donohue, may file a reply no later than fourteen (14) days from service of Plaintiffs’ opposition.
4. This stipulation may be executed in counterparts, and a signature transmitted by electronic means shall be deemed an original for all purposes.

For these reasons, Plaintiffs and Defendants GI and Donohue respectfully request this Court enter an Order extending the deadline for Defendants GI and Donohue to file any Motion to Dismiss to August 30, 2021, the deadline for Plaintiffs’ response to any Motions to Dismiss to September

29, 2021, and allow Defendants GI and Donohue 14 days from service of Plaintiffs' response to file a Reply.

Dated: August 23, 2021

RESPECTFULLY SUBMITTED:

/s/ Phillip Miller

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed with the Court's electronic filing system and thereby sent via email to the following:

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on this the 23rd day of August, 2021.

/s/ Brian D. Kent